

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS INC., *et al.*,¹

Debtor.

Chapter 11

Case No. 24-11967 (JKS)
(Jointly Administered)

Related D.I.: 1449, 1556

NOTICE OF APPEAL OF CERTAIN ADMINISTRATIVE CLAIMANTS

PLEASE TAKE NOTICE that administrative claimants Hello Sofa, LLC (“Hello Sofa”) and Franklin Corporation (“Franklin”) (collectively, the “Administrative Claimants”), by and through undersigned counsel, hereby appeal to the United States District Court for the District of Delaware pursuant to 28 U.S.C. §§ 158(a), 158(c)(2) and 1292(a)(1), and Rules 8002 and 8003 of the Federal Rule of Bankruptcy Procedure from (i) the *Order (I) Approving the Asset Purchase Agreement, (II) Authorizing and Approving the Sale of Certain of the Debtors’ Assets Free and Clear of All Claims, Liens, Rights, Interests, Encumbrances, and Other Assumed Liabilities and Permitted Encumbrances, (III) Authorizing and Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief* [D.I. 1556] entered on January 2, 2025 in the above-captioned case (attached hereto as **Exhibit A**, the “Sale Order”) and (ii) the *Order Shortening Notice of Motion of Debtors for Entry of An Order (I) Approving Sale of Debtors’ Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Debtors to Enter Into and Perform Under the GBRP APA,*

¹ The debtors and debtors in possession in these chapter 11 cases (hereinafter “Debtors”) are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

(III) *Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases, and*
 (IV) *Granting Related Relief*[D.I. 1449] entered on December 27, 2024 (attached hereto as **Exhibit B**, the “Order Shortening Time”), including, without limitation, any and all orders, judgments, decrees, decisions, rulings, and opinions that may subsequently be entered regarding the Sale Order or the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that the names of all parties to the Sale Order and the Order Shortening Time and the names, addresses, and telephone numbers of their attorneys are as follows:

	<u>PARTY</u>	<u>ATTORNEYS</u>
1.	Big Lots, <i>et al.</i> , Debtors	<p>MORRIS, NICHOLS, ARSHT & TUNNELL LLP Robert J. Dehney, Sr. Andrew R. Remming Tamara K. Mann Sophie Rogers Churchill Casey B. Sawyer 1201 N. Market Street, 16th Floor Wilmington, DE 19801 Tel: (302) 658-9200 rdehney@morrisnichols.com aremming@morrisnichols.com tmann@morrisnichols.com srchurchill@morrisnichols.com csawyer@morrisnichols.com</p> <p>-and-</p> <p>DAVIS POLK & WARDWELL LLP Brian M. Resnick Adam L. Shpeen James I. McClammy Stephen D. Piraino Ethan Stern 450 Lexington Avenue New York, NY 10017 Tel.: (212) 450-4000</p>

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2.	Gordon Brothers Retail Partners, LLC	RIEMER & BRAUNSTEIN LLP Steven E. Fox Times Square Tower Seven Times Square, Suite 2506 New York, NY 10036 Tel: (212) 789-3150 sfox@riemerlaw.com
3.	Hello Sofa, LLC and Franklin Corporation, Appellants	GOLDSTEIN & MCCLINTOCK LLP Maria Aprile Sawczuk 501 Silverside Road, Suite 65 Wilmington, DE 19809 Tel: (302) 444-6710 marias@goldmclaw.com --and-- PHELPS DUNBAR LLP Danielle Mashburn-Myrick 101 Dauphin Street, Suite 1000 Mobile, AL 36602 Tel: (251) 441-8202 Danielle.mashburn-myrick@phelp.com
4.	Andrew Vara, United States Trustee Region 3	Linda J. Casey Trial Attorney United States Department of Justice Office of the United States Trustee J. Caleb Boggs Federal Building 844 King Street, Suite 2207, Lockbox 35 Wilmington, DE 19801 Tel: (302) 573-6491 Linda.Casey@usdoj.gov

5.	Official Committee of Unsecured Creditors	<p>COLE SCHOTZ P.C. Justin R. Alberto Stacy L. Newman 500 Delaware Avenue, Suite 1410 Wilmington, DE 19801 Tel: (302) 652-3131 jalberto@coleschotz.com snewman@coleschotz.com</p> <p>- and -</p> <p>MCDERMOTT WILL & EMERY LLP Darren Azman Kristin K. Going Stacy Lutkus Natalie Rowles One Vanderbilt Avenue New York, NY, 10017 Tel: (212) 547-5400 dazman@mwe.com kgoing@mwe.com salutkus@mwe.com nrowles@mwe.com</p>
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Dated: January 30, 2025
Wilmington, DE

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